



STATE OF MICHIGAN  
OFFICE OF THE GOVERNOR  
LANSING

JENNIFER M. GRANHOLM  
GOVERNOR

JOHN D. CHERRY, JR.  
LT. GOVERNOR

## Chronic Wasting Disease Task Force

### Public Meeting Minutes

September 16, 2003  
The Clarion Hotel  
Lansing, Michigan

A public meeting of the Chronic Wasting Disease (CWD) Task Force was held on September 16, 2003, at 2 p.m. at the Clarion Hotel in Lansing. Those Task Force Members present were:

Dr. Howard Tanner, Chair  
Dr. William Taylor, Vice Chair  
Dr. George Anderson  
Dr. Rosina Bierbaum  
Dr. Lonnie King

Also present were Ex-Officio members, staff to the Task Force, and the public.

Dr. Tanner explained that although Lt. Governor Cherry had hoped to open the meeting with some remarks, he has been held up at the Capitol working on urgent legislative matters and would try to join the meeting later.

Dr. Steve Schmitt, MDNR Wildlife Veterinarian, introduced Dr. Beth Williams. He described her as a disease researcher from Wyoming, a pathologist with the State Diagnostic Lab, the person who determined that CWD was a prion disease when she was a college student, has researched many wildlife diseases and, in fact, is the editor of the Journal of Wildlife Diseases, the most prestigious wildlife disease journal in the world.

Dr. Williams thanked the Task Force members for inviting her and said a lot of people have been working on CWD for years and she personally has worked with many associates, universities, agencies and institutions to obtain more information about the disease.

She explained that CWD only occurs in mule deer, white-tailed deer and elk. There are questions about transmission to other species; however, research has not been completed. She explained a study regarding the transmission of CWD into cattle and said after being inoculated with CWD tissue in the brain, 5 out of 13 cattle did develop CWD. However, there is no evidence of natural transmission to bovine after several research projects. Studies will continue to occur over the next several years.

She then explained the Pathogenesis study, which looked at the dynamics of three species that are susceptible. She described research where there was oral inoculation and the different incubation periods. She also showed some slides of species as far as pathogenesis.

There is considerable research being done on transmission and how the disease spreads. She said they look at individual animals and groups of animals. She said it is believed to be spread by either feces, saliva, urine or other kinds of excreta. There is no research to date to prove it is maternal, and there are no techniques to date that are sensitive enough to detect CWD in feces. She said it is believed that feeding and density play a major part in the transmission of the disease. While animal-to-animal is important, it appears to take close, long-term relationships, not casual.

She said they also question what role a carcass plays in transmission. How does the decaying carcass disperse the agent into the environment? While there's no indication that scavengers play a part in transmission, there are questions about moving or ingesting and depositing them as feces somewhere else. Also what role do invertebrate play in transmission, if any?

Environmental contamination is important for populations that haven't been exposed to CWD but develop it. There are some studies going on regarding soil contamination. Dr. Williams also stressed the point that transmission dynamics may be very different in different environments. It is important to understand local dynamics and the fact that there are different habitat and density levels. She said there is a lot of funding going into research of prion diseases in general and she thinks there will be a lot of information coming out in the future.

Dr. Williams then entertained questions from the Task Force and public.

Mr. Eric Antisdale asked her how she knew animals that were in a research project had CWD if there were no signs. She said they inspected the lymphoid tissue of the animals, which is a live test. It is very costly and stressful on the animal.

Dr. Schmitt posed the question that if there is no evidence humans and livestock can get the disease, "what's the big deal." Dr. Williams said, we don't have all of the answers. While we don't have evidence that humans and livestock can get CWD, we haven't looked long enough. The livestock studies have been fairly limited and much more research is needed. While we haven't seen long-term declines in the cervid populations, there is a potential to cause detrimental effects on mule deer and we don't want it to spread to other areas. We want to maintain healthy herds and prevent the disease where we can.

Mr. Alex Draper ask when Dr. Williams thought an inexpensive live test would be developed. She said she wasn't very knowledgeable about the test that Mr. Draper described but didn't think it has been applied to blood that can work in a live animal. She said she hoped down the road such a test will be developed.

She was asked what Wyoming was doing to control CWD in wildlife and she said a lot of monitoring and sampling in areas where CWD is found and possible decreasing of deer locally. She also said Harvard did a risk assessment that included some information on CWD and the EPA might do an assessment. She said funds have been disseminated from the Department of Defense to support prion research and Congress mandated that recipients were to emphasis development of diagnostic tests.

When asked about the cervid population in Wyoming, Dr. Williams said mule deer has stayed stable, while white-tailed deer and elk populations have gone up.

She was asked about nose to nose contact and she again stated that it appears it takes more than just casual contact.

Dr. Tanner thanked Dr. Williams for making the trip and sharing her CWD knowledge with the Task Force.

Dr. Arnoldi then introduced Dr. Tom Cline, the Assistant State Veterinarian from the State of South Dakota.

Dr. Cline explained that in December of 1997, the State realized that they had CWD in captured elk. Prior to that, CWD was found only in free-ranging animals. There were many meetings held and stakeholders tried to determine what needed to be done in South Dakota. He said at that time, cervids were commanding an exception price. The industry said the only way to survive was to prove that South Dakota cervid are worthy of purchase. Individuals with CWD had their animals sampled and eliminated. State regulations were developed, brought before the South Dakota Legislature and put into effect in February of 1998. From that time, there have been nine farms that have tested positive for CWD. Dr. Cline explained the legislation and also their database on each animal. He said a veterinarian checks fences annually and the 31<sup>st</sup> of December, all new offspring need to be registered in the database. Elk and deer producers have stepped forward many times and they have had excellent cooperation from them. He said the State is sure the captive cervid industry did not bring CWD into the state. The industry is viable today and works well with State government.

Dr. Schmitt asked Dr. Cline how many escapes they have each year on the 75 cervid farms. He said last year, one, where vandals broke the lock and 12 or 13 deer escaped and all but four were returned. The four were later found and harvested. They tested negative for CWD. He said they don't have many escapes because the fences are in pretty good shape. He said he would imagine in the next 10 – 15 years, the fences wouldn't have the same integrity.

Dr. King asked Dr. Cline if there were issues with the reporting system and how the information is shared. Dr. Cline said that sharing the database has been an issue and they have felt uncomfortable giving out information, however, they realize they may have to share the information in the future.

When asked about funding, Dr. Cline stated that there is no state indemnity program and the only method of collecting funds is through license fees, which are \$100 a year per farm.

Dr. Cline said the last case of CWD was in September of 2002. He said the nine farms that tested positive received their animals from the source herd. The source herd received animals in 1973 and 1974 from approximately 15 different sites in North America, specifically many zoos.

He said the case in September of 2002 was a puzzling one. The individual purchased yearly females from the source herd in the Spring of 1997. He put them in a separate pen and in December of that year, he put the animals in a pen more than 30 feet from the other animals on the property. In April of 1998, the individual cleaned and disinfected the property, taking three inches of topsoil to property approximately a half a mile away. He burned all equipment or buried. There was nothing in the pen for at least a year and a-half. However, in July of 2002, the individual contacted the State to question the health of his animals and upon testing one of the bulls, born a year and a-half after the CWD animals were taken off the property, he was found to be positive for CWD. Two other animals were found with CWD and they were born two and a-half years after the CWD animals were removed. He said even with today's science, they have no idea how this happened.

Dr. Tanner thanked Dr. Cline for coming to Michigan and sharing South Dakota's experiences.

Mr. Dan Marsh, Executive Director of the Michigan Deer and Elk Farmers Association, then introduced Dr. Wayne Cunningham, Veterinarian for the State of Colorado.

Dr. Cunningham stated that although CWD was only in Colorado and Wyoming for a long time, the disease is continuing to be found in other areas of the country. He said we must remember that CWD is a brain disease and that the term "chronic wasting disease" has been attributed to all kinds of disease. He explained research that was done at Fort Collins moved some CWD infected deer to other areas and then gave a brief history of those movements. He explained the movement of prions in the brain and the changes that take place which cause the disease. He said CWD is naturally occurring and is amplified by concentration; however, there is no association in movement in captive cervids. He also said there is no evidence that alternative livestock transmit the disease to free-roaming herds. He said movement of infected research animals caused the problem in Colorado. It was not alternative livestock. He said captive cervid are a contained population and concentration is problematic in any disease. However, you can control captive and disease surveillance is near 100 percent. Also disease eradication is possible. In free roaming populations there is no proven control mechanisms.

Dr. Cunningham explained the Colorado epidemiology tools, pathogenesis, environmental contamination and CWD challenges in Colorado. He stated that Colorado

has very stringent fencing regulations and individual fences are examined at least annually and sometimes twice a year.

He said it was very important for states to set up guidelines for movement of captive animals and have the ability to identify the inventories and movements of those animals. Providing those guidelines allows the interface between the Department of Agriculture and Natural Resources and each one has a stake in that process. He said it is extremely important that we have those guidelines in place to assure that we are not moving the disease around in alternative livestock. He said it is important to marketability.

Dr. Cunningham said there are still many questions to be answered about the disease, i.e., how does it move from older animals.

Asked if he would accept animals from South Dakota into Colorado with a five year program, Dr. Cunningham said if he was asked directly, yes, because they (South Dakota) have gone through a good process. He said, unfortunately, in Colorado they have dual authority for imports and it is cumbersome and unyielding. He said he thinks Colorado should be able to honor states that have a good process in place.

Dr. Cunningham talked about a herd infected early on when it was under the licensure of the Wildlife Department. He said the individual was very crafty and they looked at every animal by I.D. and against his inventory. He also said in the endemic area where they depopulated animals, they would find the natural offspring positive. It does cross fences.

Asked if CWD was always fatal, he said in Nebraska, a herd had 50 percent prevalence and no clinical animals. He said it makes him wonder if we are starting to handle the disease.

Dr. Tanner thanked Dr. Cunningham for addressing the Task Force.

Public comment then ensued.

Mr. Alex Draper, President of the Michigan Deer and Elk Farmers Association, thanked the Task Force for the opportunity to speak at the meetings. He said he felt PA 190 was adequate, as it already addresses many of the issues discussed at the meeting. He said the USDA recognizes cervid as livestock, the industry has a very good working relationship with the MDA, and they have shown they have the ability to step up to the plate. He also said the National I.D. Committee is trying to get a national I.D. program for animals and cervid would be part of the national program that they hope to have in place by 2005. He said the MDA and MDNR have developed a plan for CWD and any additional ownership with respect to the MDNR is not advised. He also said Michigan's ban on importation should be lifted and there is no science behind the idea of having double fencing in the state. Mr. Draper presented written testimony for the record.

Mr. Noah Hall, representing the National Wildlife Federation, said they recommend a full audit of the industry, both physical and financial, complete MDNR involvement, animal

marketing and tracking, double fencing, continuation of the import ban, moratorium on new facilities or expansion of existing facility and shared liability. He said he and Brian Preston appreciated the opportunity to address the Task Force. Mr. Hall presented written testimony for the record.

Mr. Daniel Eichinger, Marketing and Membership Director for the Michigan United Conservation Clubs (MUCC), stated that while MUCC had no quarrel with the captive cervid industry, the policies that MUCC pursues are intended to safeguard the industry's future livelihood. He said MUCC requests that the ban on the importation of captive cervids remain in place until a reliable, scientifically sound, live test can be developed. Mr. Eichinger presented written testimony for the record.

Mr. Richard Sprague presented written testimony for the record.

Mr. Eric Antisdale presented written testimony for the record.

Dr. Tanner stated that this would be the last public meeting the Task Force would have. He said the sunset date had been extended to October 15, however, he was hoping they would have the recommendations to the Governor before that date.

The meeting was adjourned at 5:15 p.m.

# **Presentation of Michigan Deer and Elk Farmers Association**

**Sept. 16, 2003**

**by Alex Draper**

Thank you for the opportunity to address the Task Force for the last time prior to this board giving its recommendation to the Governor. The Michigan Deer & Elk Farmers Association and our producers have made presentations to this board. Those presentations have been presented professionally and without major to do, but it did tell you whom we are, how we work, and the commitment we have to the industry. However the other groups (MUCC, NWF, and Michigan Stewarts) seem to have an agenda that they are delivering a message that the sky is falling. To what their agenda are we do not know, except to shut industry down and/or restrict us.

In summary as stated before:

- Law regulates the industry by the authority of PA 190. That puts the oversight authority under the Dept of Agriculture.
- USDA has recognized cervidae as "Livestock".
- We have established good relationships with MDA. This industry is Agriculture by nature and they (MDA) know diseases.
- The industry have shown by their past history with Tb testing the ability to overcome adversity and prove the industry clean.
- The industry has stepped to plate in our testing CWD testing programs, having tested over 1300 animal in 150 + facilities. There are 20 producers in the Accredited Program. To be in an Accredited program is very detailed and has major producer ownership. The DNR has targeted counties with high number of privately owned operations and have tested over 4000 samples with nothing found.
- Country wide the industry has shown the ability to control CWD and get it out of our herds. This disease started in a Captive Wildlife Facility with some of the same people that have given presentations to this board. They gave it to us not the other way around.
- At the National Identification meeting this week, they included cervidae in the plans for a national identification plan which will give a national plan for tracking ID. Their plans are to roll the ID in 2005, and have all the mechanics in place by 2006. This will allow animals to be tracked nationally.

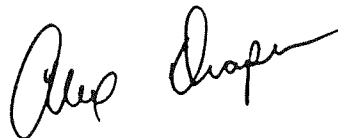
Recommendations to the board for consideration when addressing the Governor:

- The current status of relationship between MDA and the industry isn't broken so don't fix it. All the issues of the anti's are covered by the law that is place today and regulated by MDA, eg...escapes, fences, identification, inventory, and registration.
- MDA and MDNR have developed a plan for CWD that is an excellent document and covers all aspects of the disease including both wildlife and privately owned animals.
- Any additional ownership with respect to MDNR is not advised. MDNR has provisions that was agreed upon and is the PA 190 was legislative authority. Any animal violations (taking of wildlife) can be prosecuted by DNR. So what is the issue they need more authority? The issues with TB are more overwhelming than they can control. then to add additional CWD work will be out of control.
- Michigan's ban needs to be lifted and moving regulations need to be established that will allow the industry to move animals into Michigan under restricted conditions. Those regulations need to be consistent with other States and USDA rules for movement.
- There is no science that says double fencing will stop CWD from being transmitted. The industry has tested across the country since the inception of this disease and there are no signs there is CWD around infected herds that have been destroyed and are still in existence.

Thank you for allowing us the opportunity to explain our industry's concerns and issues that is at hand. MDEFA would hope the recommendations to the Governor would be favorable to the industry and not stifle our progress that we have achieved to date. That progress has been positive and we have proven ourselves. Give the industry and MDA an opportunity to work with the Governors office and any other office to resolve any future issues that come up that effect the industry. Do not put undue restrictions that have not been well thought out and brought to table.

Thank you

Alex Draper  
President MDEFA

A handwritten signature in black ink, appearing to read "Alex Draper", written in a cursive style.





NATIONAL  
WILDLIFE  
FEDERATION\*  
[www.nwf.org](http://www.nwf.org)\*

# MEMORANDUM

TO: Chronic Wasting Disease Task Force

FROM: Brian Preston, Regional Organizer

DATE: September 16, 2003

RE: **Final Comments and Recommendations**

---

## **Introduction:**

This document is intended to present final comments and recommendations for the prevention of CWD in the State of Michigan. The general consensus of wildlife professionals and national CWD experts present the two primary CWD risk factors as baiting/supplemental feeding and the captive cervid industry. With continued pursuit of the DNR to eliminate baiting and supplemental feeding of white tailed deer, the remaining primary risk factor in Michigan is the captive cervid industry.

National Wildlife Federation is opposed to the private ownership and commercialization of free roaming, big and trophy game animals. Some key reasons for the policy are:

- The underlying principle of the North American system of wildlife management is to conserve and restore wildlife **in balance with the needs of the public as a whole**
- The excessive wildlife density created by many captive cervid facilities (over 7000 per square mile) contributes to the exponential spread of dangerous disease and parasites
- Commercialization creates incentives for illegal activities impacting free ranging populations

Prevention is the obvious priority for such a persistent disease. The CWD infected site in Ft Collins Colorado was aggressively managed by; depopulating every animal in the facility, turning over several inches of soil and repeatedly spraying structures and pastures with swimming pool chlorine. After waiting a year, they brought in 12 elk calves, but a few years later two of those elk contracted CWD. CWD Expert Michael W. Miller stated "Considering the persistence of prions, Wisconsin may have to live with CWD".

Michigan currently sits on the "high risk" edge of the CWD battle line. A near decade of tuberculosis in our free ranging wildlife provides powerful lessons in disease prevention and the high cost of procrastination. This situation calls for strong and decisive leadership by the CWD Task Force, Governor Granholm and the Michigan Legislature.

## Recommendations

### Full Industry Audit

Fundamental management practices require “due diligence” before making management decisions on any process, operation, or industry. Effective management practices and oversight policy can not be developed without first performing due diligence on the captive cervid industry. The recent Wisconsin captive cervid facility Audit produced 460 total violations out of 550 facilities. This high percentage of violations demonstrates that “well regulated” does not mean compliant. Before any long-term regulatory and oversight policy is determined there should be a full audit of every captive cervid operation to include:

- Physical Facility – Modeled after the Wisconsin Audit and expedited by enlisting the support of State Conservation Officers
- Records Review - Also using the Wisconsin model to assess the accuracy, consistency, and thoroughness of animal tracking records
- Financial - Validate actual economics with cost and revenue data divided into the 3 market categories (meat, velvet, canned hunting livestock)

### DNR Involvement

Professional wildlife management agencies must continue to be the primary managers of wildlife. Michigan law may have classified captive white tail deer and elk as “livestock” but the management of these facilities explicitly and directly impacts our free ranging wildlife. Agriculture style management of wildlife historically aims to eliminate any real or perceived impacts to agriculture. The devastating impact of this management philosophy is demonstrated in the past extermination of wolves and the recent slaughter of Yellowstone bison. Nearly 50% of the restored bison herd was lost in one winter due to shooting on public lands and forced starvation due to Agriculture’s mistaken perception that the bison presented a disease threat to cattle.

The Agriculture department has also demonstrated near opposite disease prevention policy involving livestock wildlife versus traditional livestock. In May of this year, within hours of notification of a single case Bovine Spongiform Encephalopathy (BSE) in Canada, the Department of Agriculture banned imports across the entire Canadian border. Within 24 hours U.S. Customs agents confiscated lunch meat sandwiches from commuters coming across the boarder. Agriculture simultaneously banned all cervid big game meat imports even though no link exists between BSE and wildlife. At the same time the State Agriculture department continually entertains arguments to lift import bans of captive cervids in the face of hundreds of cases of Transmissible Spongiform Encephalopathy (TSE) and Michigan classified as a “high risk” CWD state.

The Department of Agriculture lacks the expertise, the resources, and the fundamental mission tasking to adequately protect the free ranging wildlife of Michigan. The wildlife of Michigan is held in the public trust for all 10 million citizens. Oversight and regulatory compliance of that public trust must include its legal steward, the Department of Natural Resources.

### **Animal Marking and Tracking**

Proper management of cervid livestock must include permanent, high visibility marking. Ear tags and brightly colored body markings will provide basic animal tracking capability for proper record keeping and easy identification of egressed and regressed animals. These identification requirements should be considered standard practice in the management of "livestock".

### **Fencing Standards**

Current science has not been able to determine specific causes or minimum exposures for CWD transmission. Egress/regress and fence line contacts are major concerns of both captive cervid operators and wildlife professionals. To minimize exposure and contain infected animals fencing standards must be increased. Double fences with minimum expectable heights should be a basic requirement. Other regulations should be considered to establish minimum "tree-free" distance on both sides of fences as well as regular fencing inspection requirements.

### **Import Export Ban**

All import bans should stay in effect until a reliable live animal test is available to certify animals as CWD free. Due to the current lack of scientific evidence defining the disease incubation period, establishing a "CWD Free" timeframe would be a risky "best guess". Individual captive cervid facilities should only be authorized to move animals within Michigan after their animal movement records are verified as accurate and comprehensive.

### **No new facilities or expansion of current facilities**

With no demonstrated viable markets beyond trophy "livestock" hunts, there is no economic need to expand beyond Michigan's current estimated 1000 captive cervid facilities. The expansion of current facilities as well as new facilities will simply increase pressures to lift existing and future restrictions.

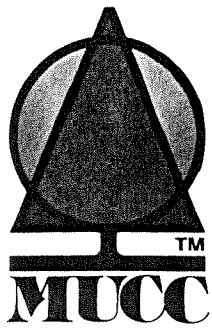
### **Shared Liability**

Federal Congressmen Mark Green was recently quoted that "CWD presents a \$1 billion impact to the state of Wisconsin". "It is a significant growing problem in a growing number of states from a wildlife management perspective and an economic perspective". In the June 2003 issue of Scientific American the spread of CWD into Wisconsin was described with the following: "Somewhere along the line, (captive cervid) businesses must have picked up incubating animals from the endemic area, and the interstate trade of cervids continued the spread, west across the continental divide and east across the Mississippi River".

Along with the billion dollar revenues claimed by the Michigan captive cervid industry there must come the corresponding financial risk associated with CWD. Liability for the prevention and if needed management of CWD should be established for both the Department of Agriculture and individual captive cervid owners. It is the sportsmen, the general public and the DNR of Wisconsin that is currently bearing the bulk of financial and other resource costs of CWD management in that state.

**Conclusion**

Weaknesses in regulation and compliance of game farms must be addressed and those in charge must be held accountable for their actions when the interests of a relative few are valued over the interests of the general public and the wildlife heritage of Michigan.



*Uniting  
Citizens to  
Conserve  
Michigan's  
Natural  
Resources  
and Protect  
OUR  
Outdoor  
Heritage*

**Home of:**

**OUT-OF-DOORS™  
Multimedia**

**OUTDOORAMA™**



**TRACKS™  
Magazine for Kids**

**OUT-OF-DOORS™  
CAMP  
FOR  
KIDS**

# Michigan United Conservation Clubs

2101 Wood St. • P.O. Box 30235 • Lansing, Michigan 48909 • 517/371-1041 • FAX: 517/371-1505 • [www.mucc.org](http://www.mucc.org)

**CWD Remarks:**

Distinguished members of the committee, my name is Daniel Eichinger, I am appearing on behalf of the Michigan United Conservation Clubs, and wish to comment, though not exhaustively, on our stated policy, and how that may reflect on the committee, and many of the concerned parties here today.

MUCC applauds the efforts of the state of Michigan, the relevant departments and agencies for their commitment to safeguarding and managing our wildlife and resources.

I wish it simply to be known, that MUCC has no quarrel with the captive cervid industry, indeed, the policies that we pursue are intended to safeguard their future livelihood. And yet, there is a responsibility that we all share to ensure that the resource is maintained and managed, and while we differ at times in mode and method, we must never waver from that intended purpose.

We therefore maintain that the ban on the importation of captive cervids remain in place until a reliable, scientifically sound, live test can be developed.

With that I will bring my remarks to a close, but I will leave the committee with one final thought. As we anxiously await the release of this committee's findings, the Michigan United Conservation Clubs are confident that the distinguished members in this room will be ever mindful of the trust that the people of this state have placed in your collective wisdom.



Saturday, August 16, 2003

CWD Task Force,

My name is Richard Sprague I appreciate the opportunity to be able to place my comments, regarding CWD and related issues, on the record. My professional background has been in Nursing and Medicine. I have been a Registered Nurse licensed by the State of Michigan for 22 years, I'm also a Physician Assistant licensed by the State of Michigan for 8 years. Over the past 22 years I have spent thousands and thousands of hours at the bedside of critically ill patients in the Intensive Care setting. A hospital is a place where people that are sick and or injured go for medical treatment, hospitals attempt to cure individuals of transmissible diseases. The health care providers must be very careful when going from room to room or patient to patient so that contamination of patients does not occur. The most efficient method of stopping the spread of disease from one patient to another is, simply, hand washing. During sterile surgical procedures such as open heart surgery, patients do develop post-op wound infections. There are new disease processes or variants that seem to become a common day thing; we have bacteria that are resistant to all current known antibiotics. We have experienced new diseases such Sudden Acute Respiratory Syndrome (SARS), West Nile Virus which was responsible for over 600 cases and over 50 deaths in our state in 2002. Many diseases like cancers, Alzheimers disease, Parkinson's disease, ALS, and even the common cold that have been studied and treated for years and still there so is much more about diseases that we don't know or understand. Everything is in a constant state of change, most change is slow as those things that influence disease mutate over time. CWD and other cervid diseases are no different; there are theories that attempt to explain these diseases and the transmission of these diseases. A theory, by definition, is just a guess and it has been proven many times that a theory that has been taken as fact has in the end been very wrong and sometimes has caused harm.

I am proud to say that I am apart of the farming heritage in our country, my family and I having been raising whitetail deer since 1997. Animals raised under the husbandry of humans are the safest and healthiest of animals. I don't believe that there would be too many individuals that would disagree with this statement. A fence in our communities is used for protection and security, a fence is required by law to be placed around a swimming pool to keep our children safe, when we lock our doors at night we believe our families are safe. Any animals behind a ten foot fence would have to be the safest livestock animals, the co-mingling between some species is certainly minimized. There were a number of different species of animals that were infected with Bovine TB. Birds, varmints, and mosquitoes, all carry and spread disease, there is no way that you can eliminate transmission of disease in a wild setting. The privately owned cervidae industry is highly regulated requiring documentation of testing, transportation, purchase of and sale of animals, all used to keep track of the privately owned ceridae industry. Some would try and say that whitetail deer and elk are special because so many of these animals enjoy their freedom and run wild, all animals I'm sure at one time were wild. Whitetail Deer and Elk are no different than all the other animals that are raised under the

husbandry of humans for our benefit. My deer are no more held captive than the dairy farmer across the street with his barbed wire fence, or the kennel or lease you use to confine your dog. Deer and Elk at the research facilities, in fact, were captured from the wild population. The newest published study on CWD by Beth Williams and Dr. Miller, stated, the first group of deer who had been born in captivity and who had CWD and that the second group were wild deer born in the wild and free of CWD and were placed in the confines of the research facility and exposed to the captive deer that were positive for CWD with the transmission of CWD between these two groups being noted. I don't know how you could have a study like this and make any conclusions or recommendations based on its findings. The research facilities in Colorado and Wyoming must be held accountable for the damage that they have caused. The research facilities have taken animals from the wild, moved animals between research facilities, released animals back into the wild (possibly intentionally or unintentionally), they have turbo charged the mutation process of CWD. If the newest study is credible then why can't a researcher visit my farm and say that my animals do not have CWD. What test were done to verify the second group was free of CWD before being brought into the research facility.

There are those in our state that believe the farming of whitetail deer and elk should be eliminated, these people, I believe, have limited knowledge regarding the behavior of farm raised deer and elk. The State of Michigan raises its herds on the lands of private citizens for profit, there are millions of dollars of damage to crops and personal property and even loss of human life directly related to the whitetail deer industry in our state. I believe that I should be allowed to use my land to raise any type of livestock I choose that will help me take care of my family. Farmers are not criminals, farmers do not require a lot of law enforcement, if there are criminals involved with the state's natural resources that should be a concern of the MDNR and other state agencies, the raising of agricultural animals should be regulated by the MDA. At no time when I was permitted under the DNR were any of my pens or facilities inspected. The first inspection of my exterior fence came after I was registered with the MDA.

I believe that the current testing/surveillance requirements for diseases such as TB and CWD are working well. The privately owned cervid industry are the only animals that can be monitored and tested to prove that they are disease free. I believe that most of the animals that have tested positive for CWD showed no clinical signs of the disease. I believe that animals can be culled and tested for CWD; this information is very very valuable. With less than 3% of the deer herd population tested it gave a 99% confidence interval at a 1% prevalence that CWD does not exist in counties outside of the endemic area in Wisconsin. Last year on my farm I tested 14 whitetail deer for CWD, which amounted for more than 10% of my entire herd. I am 99+++ percent confident that my herd is CWD free. I am apposed to double fencing, however, I do realize that when my healthy deer have minimal contact with the wild deer that possibly my herd will be contaminated not just with TB or CWD there are parasites and other communicable diseases that my herd can be exposed to.

The feeding bans, I believe, could actually work against us. On my farm if I place a single pile of feed all of the deer will congregate around this single food source, however, when I make many smaller piles through out my pasture the deer break up in to much smaller groups. I believe the feeding ban places an undue hardship of the farmers of our state and other private land owners to provide room and board for the wild whitetail and elk herds. Deer always gather together in larger groups migrating to food sources. If individuals were allowed to place feed for these animals, it is my belief that this would actually cut down on the number of deer actually eating at one particular food source.

Thank You

Richard Sprague



Public Statement to the Chronic Wasting Disease Task Force  
Eric Antisdale - Legacy Wildlife Preserve  
September 16, 2003

Good afternoon. My name is Eric Antisdale and I would like to thank you for this opportunity to speak to you again today. As I indicated to you at our last meeting I have a diverse background in natural resource management, which I believe, gives me a fairly unique perspective on this issue. At present, I sit on the Board of Directors for the Michigan Deer and Elk Farmers Association, but I want to make clear that my comments today are my own and not MEDFA's. Dan Marsh and Alex Draper are the official spokesmen for our organization.

As I stressed at the last task force meeting, I have real concerns that this board is being pressured to make certain recommendations that are not based on adequate science and will lack public support. I am specifically referring to those who propose additional regulation of the cervid farming industry and those who think the large scale eradication of free ranging cervids is the way to combat the disease if found in the wild.

I know that it is probably too late to ask this question, but I need to go on record as having asked it. What makes us think we can or should manage this disease, let alone eradicate it, if detected? Various diseases have affected Michigan's deer population for tens of thousands of years; it is natural and plays an important part in evolution. My recommendation to the task force is that we educate sportsmen and the public to these facts, rather than succumbing to special interest pressure to intervene. The facts are that cervid populations are not being decimated in those areas where the disease has been found and the public should be told this.

I do not believe that science or history support Dr. Miller's model which shows the extinction of cervids from CWD. I believe the Task Force will be making a grave mistake if they use his model as a justification for any actions. I believe it is much more likely that the disease may cause a certain amount of die off, to be followed by a population rebound made up of resistant individuals. Disease is a force of nature much like forest fires. We mere mortals may delay their affects in the short run, but in the end nature will prevail in bringing balance.

The latest figures I have from Wisconsin indicate that 42,000 deer have been tested since February 2002, 208 have tested positive for CWD. If my math is correct that works out to less than .005%. How is it the .005% is considered an epidemic warranting eradication of the entire population in the endemic area? I don't believe it does and neither do many of the hunters and landowners in Wisconsin. If you as a board are seriously considering recommending such a strategy if the disease is discovered here, I am urging you to reconsider. This strategy is not working in Colorado or Wisconsin and it will not work here. It just does not make sense to the public when the government tells them that they should kill all the deer because less than 1% of them are diseased.

The second issue, upon which I am urging restraint, is the proposal to require cervid farmers to double fence. The vast majority of the cervid farmers I know are willing to continue to work with the state agencies and other interested parties to fine tune P.A. 190, but we are not willing to be the scapegoat for this issue. We went down that road with TB and testing has proved our facilities were free of that disease. There is no evidence that free ranging cervids in the TB zone have passed that disease through the fence to privately owned herds. Those pressuring the Task Force to recommend that we be forced to double fence are trying the same tactics again.

First of all there is no scientific proof that CWD can be passed through the fence or that any of our private herds have the disease. In the end, there is no scientific proof that double fencing will prevent the spread of the disease. I can tell you with complete certainty that a double fencing requirement will fail as a strategy. It will fail for the same reason the eradication efforts are failing and that is because the affected parties will refuse to cooperate. Many cervid farmers do not have the room to double fence, others do not have the money and many others will just refuse to do it.

Rather than recommending a strategy to the administration, which includes eradication and double fencing, I am urging the Task Force to place its emphasis on research and education. At this stage of the game, the prudent thing to do is to recommend substantial increases in funding to the DNR and MDA. These agencies are doing a great job, but they do not have adequate resources to address their existing regulatory requirements, let alone the funding necessary to provide more public education and scientific research. We need a live animal test, and we need to monitor for the disease. We need scientific proof as to how this disease is spread. We need adequate funding to conduct the kinds of scientific and risk assessment studies necessary to determine if indeed we should try to manage this disease, and if so how. Thank you again for this opportunity to speak with you today.